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and

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*Attorneys for Defendants,
Walmart Inc. and Jetson Electric Bikes, LLC*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH)
Individually and as Parent and Legal Guardian)
of W.W., K.W., G.W., and L.W., minor children)
and MATTHEW WADSWORTH,)

Plaintiffs,)

v.)

WALMART INC. and)
JETSON ELECTRIC BIKES, LLC,)

Defendants.)

Case No. 2:23-cv-00118-NDF

DEFENDANTS JETSON
ELECTRIC BIKES, LLC AND
WALMART INC.'S RESPONSE
IN OPPOSITION TO PLAINTIFFS'
MOTIONS *IN LIMINE*;
DECLARATION IN SUPPORT

I, Eugene M. LaFlamme, state as follows:

1. I am an attorney at McCoy Leavitt Laskey LLC located in Waukesha, Wisconsin.
2. I am one of the attorneys of record for Defendants, Jetson Electric Bikes, LLC and Walmart Inc., admitted *pro hac vice* on August 24, 2023.
3. Attached as Exhibit 1 are the pertinent portions of Stephanie Wadsworth's deposition taken on February 27, 2024.
4. Attached as Exhibit 2 is a copy of the email transmitting Plaintiffs' Response to Second Request For Production of Jetson Electric with the attachment which Plaintiffs titled "Smoking Shed pictures_S. Wadsworth".
5. Attached as Exhibit 3 are the pertinent portions of Plaintiffs' fire origin expert Michael Schultz's deposition taken on September 10, 2024.
6. Attached as Exhibit 4 are the pertinent portions of expert Gregory Gorbett's deposition taken on October 24, 2024.
7. Attached as Exhibit 5 are the pertinent portions of expert Brian N. Strandjord's deposition taken on November 27, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: January 29, 2025



Eugene M. LaFlamme